



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



DAN WYANT  
DIRECTOR

September 17, 2012

Dr. Susan Hedman, Administrator  
United States Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard (R-19J)  
Chicago, Illinois 60604-3590

Dear Dr. Hedman:

The Marquette County Road Commission's (Road Commission) application to build County Road 595 has been closely examined by our respective staff over the past eight months. The Road Commission has been responsive to the concerns expressed in Michigan Department of Environmental Quality (MDEQ) and United States Environmental Protection Agency (USEPA) correspondence with them, including the USEPA's April 23, 2012, objection letter. At USEPA's August 28, 2012, public hearing in Marquette, local elected officials expressed overwhelming support for this road, which will reduce truck traffic in populated areas while improving access to a remote part of northwest Marquette County. While that support was far from unanimous at the hearing, the voice of the elected representatives of the local populace speaks to the benefits of this road. As director of the MDEQ, I believe the improvements to the Road Commission's proposal since last April have brought this project to the point that Michigan will soon be in a position to issue a permit under state authorities. Any permit that MDEQ issues will be appropriately conditioned to ensure that all USEPA objections will be fully resolved. I urge the USEPA to remove their objection to Michigan's issuance of a permit for this important project.

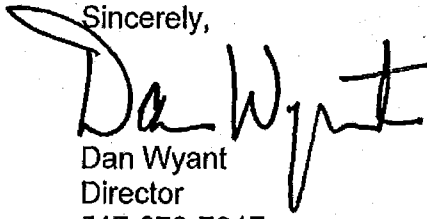
USEPA and MDEQ regulators have diligently reviewed this application and provided input to the Road Commission, including the USEPA's objection letter. The objection was based on concerns with the alternative analysis, impact analysis, and compensatory mitigation in the Road Commission's January 2012 application. The Road Commission has since made significant improvements to their application. Those improvements include clarification and amplification of the alternatives analysis that demonstrate the proposed route is the least environmentally damaging practicable alternative to achieve the project purpose. Impacts have also been effectively minimized. The Road Commission's application now includes reduced impacts to streams via shorter and wider stream crossings or bridges. The road footprint has been narrowed or removed across the rare and imperiled wetlands to minimize impacts. The proposed route has been modified in several locations to avoid critical wetlands and further reduce overall impacts. Other concerns expressed in the USEPA's objection

Dr. Susan Hedman  
Page 2  
September 17, 2012

letter will be addressed by conditioning of any permit the state issues. This will include a comprehensive plan for monitoring and minimizing wildlife collisions and invasive species monitoring and eradication. Finally, the mitigation plan has been significantly improved, now consisting of preservation of a large, critical tract of land adjacent to the McCormick Wilderness.

In closing, I urge the USEPA to remove their objection to the MDEQ issuing a permit for construction of Marquette County Road 595. Please contact me if you wish to discuss this further.


Sincerely,



Dan Wyant  
Director  
517-373-7917

cc: Mr. James Goodheart, Senior Policy Advisor, MDEQ  
Mr. William Creal, MDEQ  
Mr. Mike Masterson, MDEQ  
Mr. Steve Casey, MDEQ



Re: emissions question   
Michael Leslie to: Melanie Haveman

12/03/2012 10:29 AM

From: Michael Leslie/R5/USEPA/US  
To: Melanie Haveman/R5/USEPA/US@EPA,

Marquette County, Michigan is currently attainment for all National Ambient Air Quality Standards (NAAQS). While there are no specific transportation related requirements for attainment areas, the project sponsor for the proposed County Road 595 prepared an assessment of mobile source emissions. The mobile source inventory was developed using 2005 MDOT emission factors for VOC and NOX and from the EMFAC 2007 (v2.3) BURDEN model for the remaining NAAQS pollutants. It should be noted that the Motor Vehicle Emissions Simulator model (MOVES2010) is EPA's official on-road mobile source emission factor model for use outside of California. To accurately capture mobile source impacts from this project the MOVES model have been used. While it is clear that a longer route would have more air pollutant emissions, this area is attainment for all NAAQS, therefore higher emissions should not be the primary criteria for choosing one road over another.

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Michael Leslie, P.E.  
U.S. EPA - Region 5 (AR-18J)  
77 W. Jackson Blvd.  
Chicago, IL 60604  
Phone: (312) 353-6680  
Fax: (312) 408-2266

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Melanie Haveman	Hi Michael, I wrote you this e-mail back in August	11/30/2012 04:11:09 PM
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From: Melanie Haveman/R5/USEPA/US  
To: leslie.michael@epa.gov,  
Date: 11/30/2012 04:11 PM  
Subject: Re: emissions question

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Ex. 5 deliberative

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[REDACTED]

[REDACTED]

Thank you,  
Melanie Haveman  
U.S. EPA (ww-16j)  
77 W. Jackson Blvd  
Chicago, Illinois 60604  
312-886-2255

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Hello,

Ex. 5 deliberative

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Thank you,  
Melanie Haveman  
U.S. EPA (ww-16j)  
77 W. Jackson Blvd  
Chicago, Illinois 60604  
312-886-2255[attachment "8-8-12 Phone Log.doc" deleted by Michael Leslie/R5/USEPA/US] [attachment  
"CR 595 AAPA FINAL 6.29.12.pdf" deleted by Michael Leslie/R5/USEPA/US]